

## UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America

v.

DANIELLE NICOLE DOYLE

DOB: XXXXXX

*Defendant(s)*

) Case: 1:21-mj-00259  
 ) Assigned to: Judge Faruqui, Zia M  
 ) Assign Date: 2/24/2021  
 ) Description: COMPLAINT W/ARREST WARRANT  
 )  
 ) **WESTERN DISTRICT OF OKLAHOMA**  
 ) **CASE NO. M-21-103-SM**

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 6, 2021 in the county of \_\_\_\_\_ in the  
 \_\_\_\_\_ in the District of Columbia, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds  
 Without Lawful Authority,

18 U.S.C. § 1752(a)(2) - Knowingly Engages in Disorderly or Disruptive Conduct in Restricted  
 Building or Grounds,

40 U.S.C. § 5104(e)(2)(D) - Violent Entry and Disorderly Conduct on Capitol Grounds,

40 U.S.C. § 5104(e)(2)(G) - Violent Entry and Disorderly Conduct on Capitol Ground.

This criminal complaint is based on these facts:

See attached statement of facts.

☒ Continued on the attached sheet.

*J. Holgate*  
 Complainant's signature

Justin Holgate, Special Agent  
 Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1  
 by telephone.

Date: 02/24/2021

*Zia M. Faruqui*

2021.02.24  
 15:03:00 -05'00'

Judge's signature

City and state: Washington, D.C.

Zia M. Faruqui, U.S. Magistrate Judge  
 Printed name and title

### **STATEMENT OF FACTS**

Your affiant, Justin Holgate, is a Special Agent with the Federal Bureau of Investigation, assigned to the Washington, D.C. Field Office. In my duties as a special agent, I primarily investigate transnational organizations that traffic narcotics. Currently, I am tasked with investigating criminal activity in and around the Capitol grounds on January 6, 2021. As a Special Agent I am authorized by law or by a Government agency to engage in or supervise the prevention, detention, investigation, or prosecution of a violation of Federal criminal laws.

The U.S. Capitol is secured 24 hours a day by U.S. Capitol Police. Restrictions around the U.S. Capitol include permanent and temporary security barriers and posts manned by U.S. Capitol Police. Only authorized people with appropriate identification were allowed access inside the U.S. Capitol. On January 6, 2021, the exterior plaza of the U.S. Capitol was also closed to members of the public.

On January 6, 2021, a joint session of the United States Congress convened at the United States Capitol, which is located at First Street, SE, in Washington, D.C. During the joint session, elected members of the United States House of Representatives and the United States Senate were meeting in separate chambers of the United States Capitol to certify the vote count of the Electoral College of the 2020 Presidential Election, which had taken place on November 3, 2020. The joint session began at approximately 1:00 p.m. Shortly thereafter, by approximately 1:30 p.m., the House and Senate adjourned to separate chambers to resolve a particular objection. Vice President Mike Pence was present and presiding, first in the joint session, and then in the Senate chamber.

As the proceedings continued in both the House and the Senate, and with Vice President Mike Pence present and presiding over the Senate, a large crowd gathered outside the U.S. Capitol. As noted above, temporary and permanent barricades were in place around the exterior of the U.S. Capitol building, and U.S. Capitol Police were present and attempting to keep the crowd away from the Capitol building and the proceedings underway inside.

At such time, the certification proceedings were still underway and the exterior doors and windows of the U.S. Capitol were locked or otherwise secured. Members of the U.S. Capitol Police attempted to maintain order and keep the crowd from entering the Capitol; however, shortly around 2:00 p.m., individuals in the crowd forced entry into the U.S. Capitol, including by breaking windows and by assaulting members of the U.S. Capitol Police, as others in the crowd encouraged and assisted those acts.

Shortly thereafter, at approximately 2:20 p.m. members of the United States House of Representatives and United States Senate, including the President of the Senate, Vice President Mike Pence, were instructed to—and did—evacuate the chambers. Accordingly, the joint session of the United States Congress was effectively suspended until shortly after 8:00 p.m. Vice President Pence remained in the United States Capitol from the time he was evacuated from the Senate Chamber until the sessions resumed.

During national news coverage of the aforementioned events, video footage which appeared to be captured on mobile devices of persons present on the scene depicted evidence of

violations of local and federal law, including scores of individuals inside the U.S. Capitol building without authority to be there, including Danielle Nicole Doyle, as described herein.

Following the aforementioned events at the U.S. Capitol, the FBI's Washington Field Office (WFO) received information about a subject who possibly entered the U.S. Capitol unlawfully on January 6, 2021. WFO requested that the FBI's field office in Oklahoma City speak with the individual who had provided the information (Witness 1).

On February 1, 2021, law enforcement interviewed Witness 1, who advised that Witness 1 had worked with Danielle Nicole Doyle, when they both worked for a professional sports team in Oklahoma City. Witness 1 advised that, following the events at the U.S. Capitol on January 6, 2021, Witness 1 received a photo and video aired by CNN via a friend. The video/photo was of individuals inside the U.S. Capitol during the breaching of the Capitol. Witness 1 identified Doyle as one of the individuals in the video/photo (as captured by the inserted oval below).



On February 1, 2021, law enforcement interviewed a second individual (Witness 2). Witness 2 advised that Witness 2 works for the same professional sports team in Oklahoma City and had previously worked with Danielle Nicole Doyle, when Doyle worked for the professional sports team. Witness 2 recalled that following the events at the U.S. Capitol on January 6, 2021, employees of the professional sports team circulated a video that CNN had aired. The video was of individuals inside the U.S. Capitol during the breaching of the Capitol. Witness 2 obtained a copy of the video and identified Doyle as one of the individuals in the video.

Your affiant has viewed the video in which Witnesses 1 and 2 identified Danielle Nicole Doyle as one of the individuals who entered the U.S. Capitol during the events of January 6, 2021. Your affiant has reviewed additional footage of these events, including surveillance video provided by the U.S. Capitol Police of the Capitol's interior. While reviewing the additional video – with footage from multiple locations inside the U.S. Capitol – your affiant observed the subject identified by Witnesses 1 and 2 as Doyle.



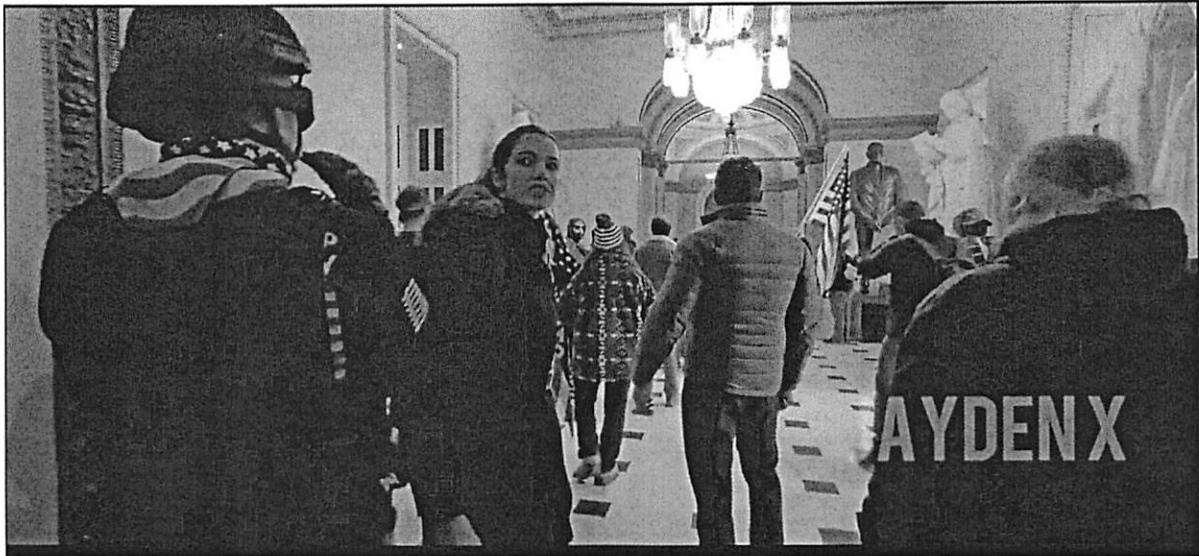
Specifically, in one surveillance video, Doyle is observed climbing through a window from the outside into the interior of the U.S. Capitol building.



In another surveillance video, Doyle is recorded walking down an interior staircase of the Capitol building, known as the Supreme Court Chambers stairs, holding a cellphone in her right hand.



In another video, Doyle is recorded walking through the hallway in the Capitol building.

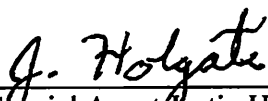


During the investigation, your affiant reviewed several videos from inside the interior of the Capitol building on January 6, 2021, that recorded the person identified by Witness #1 and Witness #2 as Danielle Doyle. Your affiant also obtained a copy of Danielle Nicole Doyle's Oklahoma driver's license that contained a photograph of Doyle. Your affiant compared the images from the Capitol videos and Doyle's Oklahoma driver's license photograph, and it appears visually to be the same person.



Based on the foregoing, your affiant submits that there is probable cause to believe that Danielle Nicole Doyle violated 18 U.S.C. § 1752(a)(1) and (2), which makes it a crime to (1) knowingly enter or remain in any restricted building or grounds without lawful authority to do; and (2) knowingly, and with intent to impede or disrupt the orderly conduct of Government business or official functions, engage in disorderly or disruptive conduct in, or within such proximity to, any restricted building or grounds when, or so that, such conduct, in fact, impedes or disrupts the orderly conduct of Government business or official functions; or attempts or conspires to do so. For purposes of Section 1752 of Title 18, a "restricted building" includes a posted, cordoned off, or otherwise restricted area of a building or grounds where the President or other person protected by the Secret Service, including the Vice President, is or will be temporarily visiting; or any building or grounds so restricted in conjunction with an event designated as a special event of national significance.

Your affiant submits there is also probable cause to believe that Danielle Nicole Doyle violated 40 U.S.C. § 5104(e)(2)(D) and (G), which makes it a crime to willfully and knowingly (D) utter loud, threatening, or abusive language, or engage in disorderly or disruptive conduct, at any place in the Grounds or in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress or either House of Congress, or the orderly

conduct in that building of a hearing before, or any deliberations of, a committee of Congress or either House of Congress; and G) parade, demonstrate, or picket in any of the Capitol Buildings.

  
\_\_\_\_\_  
Special Agent Justin Holgate  
Federal Bureau of Investigation

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone, this 24<sup>th</sup> day of February, 2021.

  2021.02.24  
15:00:48 -05'00'  
\_\_\_\_\_  
Zia M. Faruqi  
U.S. MAGISTRATE JUDGE



## UNITED STATES DISTRICT COURT

for the

District of Columbia

United States of America  
v.

DANIELLE NICOLE DOYLE

Defendant

) Case: 1:21-mj-00259  
 ) Assigned to: Judge Faruqui, Zia M  
 ) Assign Date: 2/24/2021  
 ) Description: COMPLAINT W/ARREST WARRANT  
 )  
 )

## ARREST WARRANT

To: Any authorized law enforcement officer

**YOU ARE COMMANDED** to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) DANIELLE NICOLE DOYLE,  
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment    ☐ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☒ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1752(a)(1) - Knowingly Entering or Remaining in any Restricted Building or Grounds Without Lawful Authority;

18 U.S.C. § 1752(a)(2) - Knowingly Engages in Disorderly or Disruptive Conduct in Restricted Building or Grounds;

40 U.S.C. § 5104(e)(2)(D) - Violent Entry and Disorderly Conduct on Capitol Grounds;

40 U.S.C. § 5104(e)(2)(G) - Violent Entry and Disorderly Conduct on Capitol Ground.

Date: 02/24/2021

2021.02.24  
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Issuing officer's signatureCity and state: Washington, D.C.Zia M. Faruqui, U.S. Magistrate JudgePrinted name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_.

Date: \_\_\_\_\_

Arresting officer's signaturePrinted name and title

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**UNITED STATES OF AMERICA**

**v.**

**DANIELLE NICOLE DOYLE,**

**Defendants.**

Case: 1:21-mj-00259

Assigned to: Judge Faruqi, Zia M

Assign Date: 2/24/2021

Description: COMPLAINT W/ARREST WARRANT

**VIOLATIONS:**

**18 U.S.C. § 1752(a)(1)**

**(Entering and Remaining in a Restricted  
Building or Grounds)**

**18 U.S.C. § 1752(a)(2)**

**(Disorderly and Disruptive Conduct in a  
Restricted Building or Grounds)**

**40 U.S.C. § 5104(e)(2)(D)**

**(Disorderly Conduct in  
a Capitol Building)**

**40 U.S.C. § 5104(e)(2)(G)**

**(Parading, Demonstrating, or Picketing in  
a Capitol Building)**

**UNDER SEAL**

**ORDER**

This matter having come before the Court pursuant to the application of the United States to seal criminal complaint, the Court finds that, because of such reasonable grounds to believe the disclosure will result in flight from prosecution, destruction of or tampering with evidence, intimidation of potential witnesses, and serious jeopardy to the investigation, the United States has established that a compelling governmental interest exists to justify the requested sealing.

1. IT IS THEREFORE ORDERED that the application is hereby GRANTED, and that the affidavit in support of criminal complaint and other related materials, the instant application to seal, and this Order are sealed until the arrest warrant is executed.



2. IT IS FURTHER ORDERED that the Clerk's office shall delay any entry on the public docket of the arrest warrants until the arrest warrant is executed.

Date: February 24, 2021

 2021.02.24  
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ZIA M. FARUQUI  
UNITED STATES MAGISTRATE JUDGE